

**TWO-WAY COMMUNICATIONS, INC.
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VIA ELECTRONIC FILING

February 20, 2018

Marlene H. Dortch, Secretary
Office of the Secretary
Federal Communications Commission
445 12th Street, S.W.
Suite TW-A325
Washington, DC 20554

**Annual 47 C.F.R. § 64.2009(e) CPNI Certification
EB Docket No. 06-36**

**Two Way Communications, Inc.
FCC 499 Filer ID 824586**

Dear Ms. Dortch:

Two Way Communications, Inc. pursuant to Section 64.2009(e) of the Commission's rules, hereby submits its 2017 CPNI Certification and Accompanying Statement.

If you have questions, please contact me.

Yours truly,


Lester L. Boihem Jr.

Annual 47 CFR § 64.2009(e) CPNI Certification for 2018 covering the prior calendar year 2017

EB Docket 06-36

1. Date filed: 02/20/2018
2. Name of company(s) covered by this certification: Two Way Communications
3. Form 499 Filer ID: 824586
4. Name of signatory: Lester L. Boihem Jr.
5. Title of signatory: Vice President
6. Certification:

I, Lester Boihem, certify that I am an officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. See 47 CFR § 64.2001 et seq.

Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements (including those mandating the adoption of CPNI procedures, training, safeguards, recordkeeping, and supervisory review) set forth in section 64.2001 et seq. of the Commission's rules.

The company **has not** taken actions (i.e., proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past year.

The company **has not** received customer complaints in the past year concerning the unauthorized release of CPNI.

The company represents and warrants that the above certification is consistent with 47 CFR § 1.17, which requires truthful and accurate statements to the Commission. The company also acknowledges that false statements and misrepresentations to the Commission are punishable under Title 18 of the U.S. Code and may subject it to enforcement action.

Signed


Lester L. Boihem Jr.

Attachment: Accompanying Statement explaining CPNI procedures

TWO WAY COMMUNICATIONS, INC.

STATEMENT OF CPNI OPERATING PROCEDURES

1. It is the policy of Two Way Communications, Inc. (the "Company") not to use, disclose, or permit access to Customer Proprietary Network Information ("CPNI"), as defined in the FCC's rules.
2. The Company has established a program to inform and train personnel that they may not use, disclose, or permit access to CPNI for any purpose. At present, the Company does not engage in outbound marketing using CPNI. The Company has an express disciplinary process in place to discipline violations of its CPNI policy.
3. Because the Company does not use, disclose or permit access to CPNI, it does not need to maintain a record of sales and marketing campaigns that use customers' CPNI, or of instances where CPNI is disclosed to third parties, or where third parties were allowed access to CPNI.
4. Because the Company does not use CPNI, the Company does not utilize a notification and customer approval process (i.e., an Opt-Out or Opt-In process). If the Company changes its marketing procedures, an appropriate customer notification process will be instituted.
5. The Company provides no online CPNI customer access of any kind.
6. Since the Company does not provide telephony services but rather only one-way dispatch paging service, customers who contact the Company via inbound calls are not able to access call detail information.
7. Customers who present themselves at the Company's retail location and who request CPNI are asked for proper photographic identification (i.e., state issued driver's license or the equivalent). CPNI will be disclosed only if the customer presents valid photo ID matching the customer's account information.
8. The Company has not detected any unauthorized access to CPNI, either by employees, pretexters, or other third parties. The Company did not receive any customer complaints regarding CPNI in 2017.
9. The Company will notify the customer immediately if the customer's address of record is created (except at the time of service initiation) or changed. This notification is made by mail to the customer's pre-existing address of record, and does not reveal the changed information.
10. In the event of any breach of a customer's CPNI as described in section 64.2011 of the FCC rules, the Company will, as soon as practicable and in all events within seven (7) days of determination of the breach, notify law enforcement through <http://www.fcc.gov/eb/cpni>, and subsequently notify the customer(s), in accordance with the procedures and in the sequence prescribed by that rule section. The Company will maintain a record of any such breaches and notifications for at least two (2) years.
11. The Company has in place a supervisory review process regarding compliance with its CPNI policy.